

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

v.

VANCE COUNTY, NORTH
CAROLINA, VANCE COUNTY
SHERIFF'S OFFICE, PETER WHITE,
in his official and individual capacities,
LAWRENCE D. BULLOCK, in his
official and individual capacities,
WELDON WALLACE BULLOCK, in
his official and individual capacities.

REQUEST FOR ADMISSION

Defendants.

Plaintiff Justin J. White requests that Defendant Lawrence Bullock, individually and in his capacity as Sheriff of Vance County and head of the Vance County Sheriff's Office (VCSO) admit or deny the following statement of law. If objection is made, please state the reason for the objection. If denying the matter, please set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter.

PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS

Justin J. White., by his counsel, submits the following Requests for Admissions to Defendant Lawrence Bullock pursuant to FRCP Rule 36.

INSTRUCTIONS

If Defendant Bullock (Hereafter, "Defendant") fails to respond or object to any request within 30 days of the service of the Requests, the matter shall be deemed admitted under Rule 36.

As is more fully set out in Rule 36(a), Defendant must admit or deny each request, and, where necessary, specify the parts of each request to which it objects or cannot in good faith admit or deny. If the Defendant objects to only part of a Request, it must admit or deny the remainder of the Request. In the event that the Defendant objects to or denies any Request or portion of a Request, the Defendant must state the reasons for its objection or denial. These Requests shall be deemed continuing and supplemental answers shall be required if you directly or indirectly obtain further information after your initial response as provided by FRCivP Rule 26(e). Each Request solicits all information obtainable by Defendant Lawrence Bullock from Defendant's attorneys, investigators, agents, employees and representatives. If you answer a Request on the basis that you lack sufficient information to respond, describe any and all efforts you made to inform yourself of the facts and circumstances necessary to answer or respond.

DEFINITIONS

1. The word "or" is used herein in its inclusive sense unless the context clearly requires otherwise.
2. The term "document" means and includes without limitation all correspondence, memoranda, certificates, notes, books, manuals, pamphlets, brochures, advertisements, books of account, balance sheets, financial statements, profit and loss statements, working papers, schedules, diaries, calendars, logs, time records, equipment records, microfilms, transcripts, recordings, tapes, telexes, telegrams, files, proposals, bids, offers, contracts, agreements, change orders, worksheets, drawings, blue prints, designs, specifications, time cards, compilations, graphs, charts, bills, statements, invoices, receipts, bills of lading, shipping records, confirmations, applications, purchase orders, checks, checkbooks and other checking records, photographs, formulae, prescriptions, studies, projections, reports, computer programs, information contained in computer banks, tapes, cards, printouts and drafts to the extent they differ from the originals, and all other records and papers of any nature whatsoever.

3. Any reference to a specifically named person, corporation or other entity and any reference generally to "person" shall include the employees, agents, representatives and other persons acting on behalf thereof or through whom the referenced person acts. The term "person" means and includes natural persons, corporations, partnerships, joint ventures, sole proprietorships, associations, trusts, estates, firms and any other entity.

4. As used herein, "Plaintiff" means, unless otherwise indicated, Justin J. White.

5. As used herein, "Defendant", shall be deemed to include Lawrence Bullock, as well as their agents, attorneys, representatives or any other person acting on their behalf or on behalf of any one of them

FIRST SET OF ADMISSIONS

1. Admit that, at all times relevant to this inquiry, Defendant Lawrence Bullock (Defendant) was serving as the Chief Deputy of the Vance County Sheriff's Office (VCSO).

2. Admit that, as Chief Deputy, Defendant was second in command of the VCSO supervised all divisions of the VCSO and its deputies.

3. Admit that the VCSO is comprised of seven divisions (Administrative, Patrol, Narcotics/Vice, Criminal Investigations Unit, K-9, Court and Civil Divisions).

4. Admit that Plaintiff was assigned to Patrol Division.

5. Admit that Plaintiff completed six weeks of field training with Lieutenant Campbell and Deputy Wayne.

6. Admit that Plaintiff was initially assigned to Squad A, supervised by Lt. Campbell and Sgt. Roberson.

7. Admit that Plaintiff was required to serve arrest warrants alone.

8. Admit that Plaintiff was never issued a ticket/citation book.

9. Admit that Plaintiff was not permitted to carry or use a baton, taser or OC pepper spray.

10. Admit that Plaintiff was not issued a laptop.

11. Admit that, in November 2017, Plaintiff was transferred from Sgt. Roberson's squad to Sgt. Alexander's squad.

12. Admit that in January of 2018, Captain Watkins, Lieutenant Campbell, Sergeant Roberson, Sergeant Alexander and Deputy Wayne met to discuss Plaintiff's shift transfer.

13. Admit that Defendant is not, or was not at the time of Plaintiff's termination, a Use of Force expert.

14. Admit that in December, 2017, Plaintiff lodged a complaint with Defendant against Captain Watkins and Lieutenant Campbell.

15. Admit that on June 15, 2018 Plaintiff filed two internal discrimination complaints against Lieutenant Campbell complaining of a hostile work environment based on race and gender discrimination.

16. Admit that Plaintiff complained of race discrimination in September of 2018.

17. Admit that Plaintiff complained of race discrimination in October of 2018.

/s/ Sharika M. Robinson

SHARIKA M. ROBINSON,
North Carolina Bar No.: 44750
THE LAW OFFICES OF SHARIKA M ROBINSON, PLLC
10230 Berkeley Place Drive, Suite 220
Charlotte, NC 28262
Telephone: (704) 561 6771
Telefax: (704) 561-6773
Counsel for Plaintiff Justin J. White

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2020, the foregoing was served on the following by electronic mail:

Christopher J. Geis (Chris.Geis@wbd-us.com)

ATTORNEY FOR DEFENDANTS

/s/ Sharika M. Robinson

SHARIKA M. ROBINSON,
North Carolina Bar No.: 44750
THE LAW OFFICES OF SHARIKA M ROBINSON, PLLC
10230 Berkeley Place Drive, Suite 220
Charlotte, NC 28262
Telephone: (704) 561 6771
Telefax: (704) 561-6773
Counsel for Plaintiff Justin J. White